



OFFICE OF THE
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February 22, 2005

Anne Good
MassHousing
One Beacon Street
Boston, MA 02108

Re: Tyler Estates, PE-310

Dear Ms Good,

This correspondence is in response to your letter of January 3, 2005 that invited comments from the Town of Dunstable on the application for Project Eligibility under the Housing Starts Program for the proposed 150-unit Tyler Estates development. Through our secretary, Danice N. Palumbo's conversation with you on January 25, 2005, you agreed to extend the date to send response until February 25, 2005.

The proposed project, Tyler Estates, is for a 150 detached single-family three-bedroom homes on 158.8 acres, located on the northeasterly side of Mill Street in Dunstable. When implemented, this will increase the housing stock in Dunstable by 16%. The site contains extensive wetlands and other sensitive areas. The Applicant proposes to demolish one of the oldest structures in the Town of Dunstable at 67 Mill Street.

The Town of Dunstable has been actively seeking affordable housing projects that meet the needs of Dunstable that are consistent with the Town's ongoing planning efforts. In this particular case, the Selectmen and other Boards have tried to work with the Applicant for this project to develop it pursuant to the Local Initiative Project (LIP) Program. However, the Applicant has terminated the LIP discussions. The Board of Selectmen remains interested in this project as a LIP.

The Board of Selectman met with the Applicant in a public meeting on January 18, 2005 and discussed this proposed application for a comprehensive permit. After that meeting, the Selectmen requested input from relevant town boards, commissions and departments. This input is summarized in the attachment.

We trust MassHousing will support the Town's requests in this matter.

Sincerely,

Board of Selectmen

Town of Dunstable

Attachment: Issues of Concern of Dunstable Board of Selectmen Relevant to the Issuance of a Project Eligibility Letter for Tyler Estates, PE-310

**Issues of Concern of Dunstable Board of Selectmen
Relevant to the Issuance of a Project Eligibility Letter for
Tyler Estates, PE-310**

As noted below, we request that MassHousing issue a project eligibility letter with specificity as outlined:

1. Economic Impact

This project will increase the Town's housing stock by 16% and will have a serious impact the Town's infrastructure and related municipal function.

We request that MassHousing include as a condition of project eligibility, approval of the requirement that the applicant submit an economic feasibility study demonstrating the impacts and propose solutions for, the resulting economic stress this project will place on a small and rural community. The project eligibility approval should allow the Board of Appeals to ascertain whether the project will unreasonably impact the community and if so, the project eligibility approval will be rescinded.

2. Public Safety

The proposed project will generate significant traffic in a rural community. The additional traffic volume will impact the related intersections of Mill Street and Main Street as well as Main Street and Pleasant Street. In addition, the project's proposed entrances to the site on Mill Street are too close and will create a public safety hazard. **We suggest that MassHousing require a traffic study that addresses these and related public safety/transportation issues. We request that MassHousing state that the traffic study must address the concerns of the Board of Appeals or the project eligibility letter will be rescinded.**

We request that MassHousing require that road widths in the project are a minimum of 22 feet to 24 feet with wide cul-de-sacs to allow fire trucks and delivery vehicles adequate turning radius.

We request that MassHousing require a sidewalk be constructed within the development as well as the provision of adequate on and off street parking, as determined by the Board of Appeals.

3. Public Health

The respective boards, including the Selectmen, are concerned that the proposed project's proximity to Salmon Brook and the proposed volume of wastewater generated by the development within the watershed of Salmon Brook will threaten the quality of the Town's primary source of potable water. **We request MassHousing include in the project eligibility letter the condition that the letter will be revoked if the Board of Appeals is**

not satisfied that the water quality of Salmon Brook will be protected from degradation as a result of the proposed project.

Consistent with this concern is the fact that the plans submitted to date do not indicate appropriate locations for wastewater disposal, basic stormwater management or disposal plans and related engineering drawings that enable the review of this project. While we understand that the lack of details are not required at this point in the 40B project, we suggest that it is not possible to determine the impacts this project will have on the public health of the entire Town of Dunstable without significantly more detailed plans and effort on behalf of the applicant. **We request MassHousing condition the letter to the applicant based on satisfying the specific requests for information as set forth by the Board of Appeals.**

4. Environmental Impact

The presence of extensive wetland vegetation has a direct impact on the project and its resulting success. In addition, the designation of the Petapawag ACEC (Area of Critical Environmental Concern) should be evaluated. **We request that MassHousing require the Applicant file the proper NOI or RDA/ANORAD and issue a letter stating the protection of these wetland resources shall be as determined by the Board of Appeals, in consultation with the Conservation Commission.**

The proposed project will have a significant impact on the site in general as exhibited by the plan's proposal for extremely steep grades and excessive cuts and fill across the site. **We request MassHousing require that the Applicant consider an alternative layout that will be compatible with the existing topography and not result in the wholesale destruction of this sensitive parcel.**

Due to size of this project, 150 units, in relation to the rural nature of the Town of 933 housing units, we believe that this project will have a more significant impact on Dunstable than most other 40Bs that are considered in the Commonwealth. It is our hope that MassHousing will exercise this unique opportunity to fulfill its mission in generating additional housing while respecting the important role of local government. To do this, we request that MassHousing issue the project eligibility letter with the condition that unless the Board of Appeals is satisfied with the project as proposed and revised, the project eligibility letter will be revoked.